

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

Charles K Nguyen : Case No. 19-13854-amc  
Hien T Nguyen  
Debtor(s)

ANSWER TO MOTION TO DISMISS OF THO VAN NGUYEN  
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Debtors are entitled to attend the trial and prove to the Court that the averments are not correct and they are entitled to a discharge. Furthermore, the ABC report is hearsay and Debtor will respond to the Creditor's allegations. Creditor must prove that the Debtors are not entitled to a discharge.
5. Denied that this report is accurate. Denied further that this report is entitled to any type of Judicial notice at all. There was no independent fact finder to review this case. Debtor will show at trial that Plaintiff's objection to discharge is not founded. All other allegations in this averment are denied.
6. Denied.

**WHEREFORE,** Debtor respectfully requests that this Honorable Court Dismiss Creditor's Motion to Dismiss.

**Dated:** February 20, 2025      /s/ David M. Offen  
David M. Offen, Esquire  
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A copy of this Answer is being served on MATTHEW R.  
NAHRGANG, Esquire on behalf of Creditor Tho Van Nguyen and the  
Chapter 13 Trustee via CM/ECF.

**Dated:** February 20, 2025      /s/ David M. Offen  
David M. Offen, Esquire  
Attorney for Debtor(s)  
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